



November 7, 2002

Eric Forman  
U.S. Dept. of Agriculture  
Washington, DC  
Via email [eric.forman@usda.gov](mailto:eric.forman@usda.gov)

USDA Guidelines for Interim Voluntary  
Country of Origin Labeling

Dear Mr. Forman:

Thank you for taking the time to talk with me today. I would like to set out the contents of our conversation.

I told you that we process all sorts of Tree Nuts and Peanuts, and wanted to know the ramifications of the aforementioned guidelines on our operations.

1. You mentioned that the Country of Origin Labeling requirements do not apply to Tree Nuts at all.
2. The current voluntary requirements are completely voluntary until September 30, 2004 when they become mandatory.
3. You were not sure whether the guidelines covered Mixed Nuts, i.e. Tree Nuts and Peanuts together, and invited me to comment on them.

I do not think that Mixed Nuts should be under the guidelines, as anyone who buys mixed nuts is primarily interested in the Tree Nuts. This is evidenced by the packaging of those items. They never say "Peanuts with other nuts", it is always Mixed Nuts with x% peanuts.

Thanks Again  
Rafie Miller